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DANIEL J FITZGERALD* MICHAEL C ELLIOTT

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† ALSO ADMITTED IN CONNECTICUT
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The conference is adjourmed to April 8, at 10:00 am. T. Keen

SO ORDERED.

Dated:

New York, New York February Z/ , 2008.

February 19, 2008

BY HAND

The Honorable John F. Keenan Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10007

Our Kerstan Of the MANAMI RECEIVED FEB 2 0 2008 JUDGE KEENAN'S CHAMBERS

Modesta Shipholding Ltd. v. LS Trading Engineering, S.A., Re: The state of the s

07-6942 (JFK)

Dear Judge Kecnan:

We represent the Plaintiff Modesta Shipholding Ltd. in connection with the abovereferenced Rule B maritime attachment action. We write to request that the pre-trial conference scheduled for January 21, 2008 be adjourned 45-days.

Plaintiff initiated this action seeking security in the sum of \$315,268.35 for its maritime claim via an attachment of Defendant's property in this District pursuant to Rule B. Judge Sprizzo granted Plaintiff's application on August 2, 2007. On or about August 28, 2007, Deutsche Bank advised us that, pursuant to the Order of Attachment, it had seized the sum of \$3,348.48 belonging to Defendant. On that same day, we provided Notice of Attachment. In response to our Notice, Defendant contacted us on August 29 and demanded copies of the pleadings. We responded the same day, e-mailing to Defendant copies of the Verified Complaint, the Summons, the Order of Attachment and the Process of Maritime Attachment and Garnishment. To date, however, Defendant has not appeared or moved to vacate the attachment. We continue to effect daily service of the writ in an attempt to fully secure Plaintiff's claim,

In light of the foregoing considerations, we therefore respectfully request that

Honor grant the within application.

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DATE FILLD: 2-21-08

The Honorable John F. Keenan February 19, 2008 Page 2

We thank the Court for its attention to this matter.

Respectfully submitted,

FREEHILL HOGAN & MAHAR, LLP

Manuel A. Molina

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FREEHILL, HOGAN & MAHAR LLP